

## EXHIBIT 3

CASSANDRA HOLIFIELD, PH.D.  
UNITED STATES vs STATE OF GEORGIA

December 01, 2022

1

1 IN THE UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION

4 UNITED STATES OF AMERICA, ) CIVIL ACTION  
5 Plaintiff, ) NO. 1:16-cv-03088-ELR  
6 vs. )  
7 STATE OF GEORGIA, )  
8 Defendants. )  
9 - - - - - )

10  
11 VIDEOTAPE DEPOSITION OF

12 CASSANDRA HOLIFIELD, Ph.D.

13  
14 Thursday, December 1, 2022, 9:14 a.m., EST

15  
16  
17  
18 HELD AT:

19  
20 Parker Poe  
21 1075 Peachtree Street, N.E., Suite 1500  
22 Atlanta, Georgia 30309

23  
24 WANDA L. ROBINSON, CRR, CCR, No. B-1973  
25 Certified Shorthand Reporter/Notary Public

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1           A     It depends on whether the -- the current  
2 QBE funding formula, the way that it's currently set  
3 up is at a lower rate than it is for GNETS right  
4 now. So it would mean reduce services rather than  
5 appropriate services or more services, right now,  
6 unless they really look at revising how that funding  
7 formula is looked at.

8                 So an even swap would not be an even swap.

9           Q     So your expectation is that moving from a  
10 state grant formula to a QBE formula would result in  
11 GNETS programs losing money?

12          A     Yeah, money -- equal services, yes.

13                 And right now we need more services.

14           MS. GARDNER: I would like to have this  
15 document marked as Plaintiff's Exhibit 659.

16                 (WHEREUPON, Plaintiff's Exhibit-659 was  
17 marked for identification.)

18 BY MS. GARDNER:

19          Q     You've been handed what's been marked as  
20 Plaintiff's Exhibit 659. This is an email thread  
21 between you and Vickie Cleveland and Lakesha  
22 Stevenson, from June 2019, regarding GNETS Continuum  
23 of Services, Student Level Record & Funding.

24          A     Uh-hum. (Affirmative.)

25          Q     This document is Bates-stamped GA00347596.

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1                   Do you recognize this?

2       A     Yes.

3       Q     I want to start at the bottom of this  
4     email thread, which is the first in time email. So  
5     direct your attention to the second-to-last page.

6                   This is your email to Vickie and Lakesha  
7     on June 6, 2019?

8       A     Uh-hum. (Affirmative.)

9       Q     In that email, Ms. -- the third sentence  
10    in, you say: "As you know, it's the end of the year  
11    and I'm in the process of making sure that all of my  
12    NM GNETS students appear on each of my respective  
13    district's student level record reports prior to our  
14    superintendent signing off so we will receive the  
15    correct amount of funding. I'm emailing you now  
16    because I inquired about one of my missing students  
17    on one of my district's student level record  
18    reports. We've been providing consultative services  
19    for this student and I was told since we only  
20    provide 2 hours of consultative services to the  
21    student a month, he will not be coded 4 and we will  
22    not receive funding for him. Will you please let me  
23    know how many hours a month of GNETS consultative  
24    supports earn funding?"

25      A     Uh-hum. (Affirmative.)

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1 Q Is this another example of the funding  
2 concern that we discussed earlier with GNETS sort of  
3 difficulty with providing services in general  
4 education environments because of the lack of  
5 receiving funding for that?

6 A Yes.

7 Q Moving down, you say, and this is the  
8 sentence that begins with "However."

9 You say: "As we continue to provide more  
10 intensive therapeutic support services, we have more  
11 students returning to their LRE which is amazing and  
12 is what we want to do. However, our enrollment  
13 drops and the most significantly mentally ill and  
14 behaviorally challenged students remain, while our  
15 budgets continue to shrink as we help students  
16 transition to their new LRE."

17 A Uh-hum. (Affirmative.)

18 Q This was an effect that you had been  
19 seeing at the North Metro GNETS program?

20 A Yes.

21 Q And that's about your funding is tied to  
22 enrollment?

23 A It's tied to enrollment, but the students,  
24 as we do a better job providing therapeutic  
25 supports, our numbers shrink, but the mental health

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1 issues of the students that remain are greater. So  
2 numbers don't equate to the individual needs that  
3 the students have. And that's currently the way I  
4 perceive that the budget is set up.

5 Q Ms. Cleveland responded to your email on  
6 June 7, 2019, right?

7 A Yes.

8 Q And looking towards the bottom of her  
9 response, where she says, "The GNETS continuation of  
10 services flow chart."

11 A Yes.

12 Q She says: "The GNETS continuation of  
13 services flow chart provides guidance on consult  
14 services. There is a request for consultation form  
15 in the packet. NM should follow this protocol.  
16 Several our sites have their current staff provide  
17 support for students that are reintegrating or they  
18 provide observations that are needed.

19 "NM has several support staff and the team  
20 may need to take a look at how these staff might  
21 better provide consult services. We do have  
22 programs that are providing these service with less  
23 staff. Consult services are mostly support for  
24 teachers, not direct supports to students from my  
25 observations."

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1                   What did you understand Ms. Cleveland to  
2 be saying to you?

3                   A     To figure it out. I mean basically. I  
4 just felt like, you know, she was just saying I  
5 needed to look to see how I could use the new GNETS  
6 funding State Board Rule to provide those services  
7 with the current staff that I have, which is pulling  
8 from the staff that I have with the most mental  
9 health needs.

10                  So, again, from my perspective, you're  
11 robbing Peter to pay Paul. If you have the most  
12 significant kids in the program because of their  
13 mental health and behavioral challenges, but then  
14 we're also wanting to provide those services to the  
15 kids in the LRE so we won't have recidivism, them  
16 coming back and getting those teachers trained, you  
17 can't do both with the same person effectively.

18                  Q     And to be clear, here you were talking  
19 about providing direct services to students in the  
20 LRE?

21                  A     Yes. So it was a combination of providing  
22 direct services to the students and also the staff  
23 because we're not going to be there, we being GNETS,  
24 can't be in more than one place. But if the child  
25 is going to be successful in the LRE, we need to

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1 equip the teachers with the skill set that we have  
2 where the child was successful.

3 So it's kind of a balance in training the  
4 student but also training the teachers as well to  
5 support them.

6 Q And you said the concerns that you raised  
7 in prior emails and in this one have not been  
8 addressed to your satisfaction?

9 A No.

10 MS. GARDNER: I'm going to ask that this  
11 document be marked as Plaintiff's Exhibit 660.

12 (WHEREUPON, Plaintiff's Exhibit-660 was  
13 marked for identification.)

14 BY MS. GARDNER:

15 Q You have been handed what's been marked as  
16 Plaintiff's Exhibit 660. This is an email from you  
17 to Nakeba Rahming and Vickie Cleveland, dated  
18 February 14, 2018, with the subject: "FW:  
19 Independence High School Location."

20 This is Bates-stamped GA00201024.

21 Do you recognize this?

22 A Yes.

23 Q In this email you say to Ms. Cleveland and  
24 Ms. Rahming: "I want to keep in the loop regarding  
25 the facilities complaints I've been receiving our